



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 3, 2017

BY EMAIL AND BY ECF

The Honorable Richard J. Sullivan
United States District Judge
40 Centre Street
New York, New York 10007

Re: *United States v. Parrello, et al.*, 16 Cr. 522 (RJS)

Dear Judge Sullivan:

We write pursuant to the January 6, 2017 Order directing the Government to submit a proposed severance of the defendants for trial. The Government respectfully proposes the following for the Court's consideration:

Group I:¹ Pasquale Parrello, Israel Torres, Joseph Merlino, Anthony Zinzi, Mark Mauizzo, Anthony Camisa, Anthony Vazzano, John Spirito, Ralph Balsamo, Pasquale Maiorino, Anthony Cassetta, and Nicholas Devito.

Group II:² Eugene O'Nofrio, Ralph Santaniello, Francesco Depergola, Joseph DiMarco, Vincent Casablanca, Vincent Thomas, Harold Thomas, Vincent Terraciano, Reynold Alberti, John Lembo, and Agostino Camacho.

Group III:³ Alex Conigliaro, Conrad Ianniello, Frank Barbone, Anthony DePalma, Marco Minuto, Paul Cassano, Frank Trapani, Craig Bagon, Bradford Wedra, Nicholas Vuolo, and Joseph Tomanelli.

¹ The defendants in Group I are inclusive of all of the defendants incarcerated on pre-trial detention in this case. Defendant Maiorino is currently serving 30 months' imprisonment in connection with *United States v. Maiorino*, 15 Cr. 340 (VM), a conviction in the Southern District of New York.

² Defendant Lembo is currently serving a six-year term of imprisonment stemming from a New York State conviction. Defendant Santaniello is detained on federal charges pending in the District of Massachusetts.

³ Defendant Ianniello is currently serving 36 months' imprisonment in connection with *United States v. Ianniello*, 12 Cr. 264 (NGG), a conviction in the Eastern District of New York.

Group IV: Pasquale Capolongo, Joseph Falco, Richard LaCava, John Tognino, Mitchell Fusco, Anthony Cirillo, Daniel Marino, Jr., Wayne Kriesberg, Bradley Sirkin, Michael Poli, and Carmine Gallo.

The Government proposes to proceed to trial in the order of the groupings, with Group I standing trial first. We will update the Court if and when the parties have reached a disposition with respect to each defendant. Additionally, the Government anticipates filing a superseding indictment within the next two months. For this forthcoming superseding indictment, the Government anticipates including additional substantive charges against a limited number of defendants, which will not result in voluminous additional discovery.

Respectfully submitted,

PREET BHARARA
United States Attorney
Southern District of New York

By: /s/ Abigail S. Kurland
Abigail Kurland/Amanda Kramer/Jessica
Lonergan/Jonathan Rebold/
Lauren Abinanti (SAUSA)
Assistant United States Attorneys
(212) 637-2955/2478/1038/2512

cc: all counsel (By ECF)